

SERVE: USAA Casualty Insurance Company, Uninsured/Underinsured Motorist Carrier: c/o Commissioner of Insurance, 500 J. Robertson Parkway, 5th Floor, Nashville, Tennessee 37243.

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

STEVEN WOOTEN,

Plaintiff,

vs.

BRYAN TEJEDA,

A & M TRANSPORTATION SERVICE GROUP, INC., and

Serve: Guillermo Garcia, Registered Agent
78 S.W. 7th St., 5th Floor
Miami, FL 33130

FEDEX CORPORATION,

Serve: C.T. Corporation System, Registered Agent
300 Montvue Rd.
Knoxville, TN 37919-5546

Defendants.

Civil Action No. 2-102-22

JURY TRIAL DEMANDED

FILED
CHARLES D. SUSANO III
CLERK
2022 APR 12 PM 3:23
KNOX COUNTY CIRCUIT,
CIVIL SESSIONS
AND JUVENILE COURTS

COMPLAINT

Comes now the Plaintiff, Steven Wooten, by and through counsel, for his cause of action against the Defendants, Bryan Tejada, A&M Transportation Service Group, Inc., and FedEx Corporation, and would respectfully show unto this Honorable Court:

1. On or about April 15, 2021, the Plaintiff, Steven Wooten, was operating a vehicle traveling eastbound on Interstate 640 in Knox County, Tennessee.
2. On or about April 15, 2021, the Defendant, Bryan Tejada, was operating a vehicle travelling eastbound on Interstate 640 in Knox County, Tennessee. At all times material herein, the Defendants, A&M Transportation Service Group, Inc. and FedEx Corporation, were the owners of said vehicle.
3. While operating the vehicle in question, the Defendant, Bryan Tejada, was employed by the Defendants, A&M Transportation Service Group, Inc. and FedEx Corporation, and was engaged in the ordinary course of business.
4. The Defendant, Bryan Tejada, changed lanes in his vehicle without keeping a proper lookout and collided with the Plaintiff's vehicle.

5. The Defendant, Bryan Tejada, was negligent in failing to exercise due care in violation of Tenn. Code Ann. § 55-8-136.
6. The Defendant, Bryan Tejada, was negligent in moving into an adjoining lane without ascertaining that such a maneuver could be made safely, in violation of Tenn. Code Ann. § 55-8-143.
7. The Defendant, Bryan Tejada, was negligent in turning without ascertaining that such a maneuver could be made with reasonable safety in violation of Tenn. Code Ann. § 55-8-142.
8. The Defendant, Bryan Tejada, was negligent in failing to maintain the vehicle he was operating under due and reasonable control.
9. The Defendant, Bryan Tejada, was negligent in failing to maintain a due and proper look out ahead in the direction in which he was driving.
10. The Defendants, A&M Transportation Service Group, Inc. and FedEx Corporation, were negligent in entrusting the vehicle at issue to the Defendant, Bryan Tejada.
11. The negligence of all Defendants was the sole cause of the collision.
12. The Defendants, A&M Transportation Service Group, Inc. and FedEx Corporation, are responsible for any negligence of the Defendant, Bryan Tejada, through the doctrine of *respondeat superior*.
13. As a result of the collision, the Plaintiff, Steven Wooten, suffered injury.
14. As a consequence of these injuries, the Plaintiff, Steven Wooten, incurred expenses for his medical care and treatment, suffered pain of mind and body, and has been prevented from transacting his business.

WHEREFORE, the Plaintiff, Steven Wooten, demands judgment against the Defendants for damages in the sum of ONE-HUNDRED THOUSAND (\$100,000.00) DOLLARS and costs.

The Plaintiff demands a jury try this action.

Respectfully submitted this the 12 day of April, 2022.

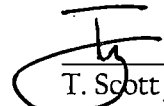

T. SCOTT JONES, BPR #014628
CHRIS W. BEAVERS, BPR #025259
Attorneys for the Plaintiff
BANKS & JONES
2125 Middlebrook Pike
Knoxville, Tennessee 37921
(865) 546-2141
tscottjones@banksandjones.com
chrisbeavers@banksandjones.com

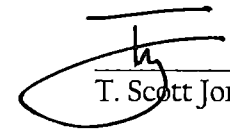
COST BOND

We, the undersigned, do hereby acknowledge ourselves as surety for all of the costs of this cause.

This the 12 day of April, 2022.

Steven Wooten, Principal


T. Scott Jones, Attorney
BANKS & JONES, Surety


T. Scott Jones, Attorney

2022 APR 12 PM 3:23
KNOX COUNTY CIRCUIT,
CIVIL SESSIONS
AND JUVENILE COURTS

FILED
CHARLES D. SUSANO III
CLERK

STATE OF TENNESSEE
THE CIRCUIT COURT FOR KNOX COUNTY

SUMMONS

STEVEN WOOTEN,
Plaintiff,

vs.

BRYAN TEJEDA, A & M TRANSPORTATION SERVICE GROUP, INC.,
and FEDEX CORPORATION,
Defendants.

Civil Action No. 2-102-22

To the above named defendant (s):

You are hereby summoned and required to serve upon T. Scott Jones, plaintiff / plaintiff's attorney, whose address is 2125 Middlebrook Pike, Knoxville, TN, 37921 an answer to the complaint herewith served upon you within 30 days after service of this summons and complaint upon you, exclusive of the day of service. A copy of the answer must be filed with the court either before or within a reasonable time after service. If you fail to do so, judgment by default can be taken against you for the relief demanded in the complaint.

ATTEST 12 day of April, 2022
Issued and attested this the _____ day of _____, 2022
CERTIFIED A TRUE COPY
Charles D. Susano III
By: A. M. (D.C.)
CIRCUIT COURT CLERK

NOTICE

Charles D. Susano III
Charles D. Susano III, Clerk
[Signature]
Deputy Clerk
2022 APR 12 PM 3:24
KNOX COUNTY CIRCUIT COURT
FILED
CLERK
CHARGE D. SUSANO III

Tennessee law provides a Ten Thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek counsel of a lawyer.

SERVICE INFORMATION

To the process server: Defendant: A & M TRANSPORTATION SERVICE GROUP, INC.
c/o Guillermo Garcia, Registered Agent
78 S.W. 7th St., 5th Floor
Miami, FL 33130

can be served at: TENNESSEE SECRETARY OF STATE
1st Fl., State Capitol, 600 Charlotte Pike
Nashville, TN 37243-0305

as agent for Service for a Non-Resident

ADA
FOR ASSISTANCE CALL
865 / 215-3641

Elizabeth.Golem@knoxcounty.org

RETURN

I received this summons on the _____ day of _____, _____.

I hereby certify and return that on the _____ day of _____, _____, I:

[] served this summons and complaint on the defendant _____ in the following manner:

[] failed to serve this summons within 90 days after its issuance because: _____

Process Server _____ Print Name _____ Address _____ Phone Number _____

STATE OF TENNESSEE
THE CIRCUIT COURT FOR KNOX COUNTY

SUMMONS

STEVEN WOOTEN,
Plaintiff,

vs.

BRYAN TEJEDA, A & M TRANSPORTATION SERVICE GROUP, INC.,
and FEDEX CORPORATION,
Defendants.

FILED
CHARLES D. SUSANO III
CLERK
2022 APR 12 PM 3:23
KNOX COUNTY CIRCUIT
CIVIL SESSIONS
AND JUVENILE COURTS
2-102-22

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You are hereby summoned and required to serve upon T. Scott Jones, plaintiff / plaintiff's attorney, whose address is 2125 Middlebrook Pike, Knoxville, TN 37921 an answer to the complaint herewith served upon you within 30 days after service of this summons and complaint upon you, exclusive of the day of service. A copy of the answer must be filed with the court either before or within a reasonable time after service. If you fail to do so, judgment by default can be taken against you for the relief demanded in the complaint.

Issued and attested this the 12 day of April, 2022

ATTEST

CERTIFIED A TRUE COPY

Charles D. Susano III

By: [Signature] (D.C.)

CIRCUIT COURT CLERK

Charles D. Susano III, Clerk

Deputy Clerk

NOTICE

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SERVICE INFORMATION

To the process server: Defendant:

BRYAN TEJEDA
3941 SW 154th Ct
Miami, FL 33185

can be served at:

TENNESSEE SECRETARY OF STATE
1st FL State Capitol, 600 Charlotte Pike
Nashville, TN 37243-0305

as agent for Service for a Non-Resident

RETURN

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Elizabeth.Golem@knoxcounty.org

Process Server

Print Name

Address

Phone Number

STATE OF TENNESSEE
THE CIRCUIT COURT FOR KNOX COUNTY

SUMMONS

STEVEN WOOTEN,
Plaintiff,

vs.

BRYAN TEJEDA, A & M TRANSPORTATION SERVICE GROUP, INC.,
and FEDEX CORPORATION,
Defendants.

Civil Action No. 2-102-2

To the above named defendant (s):

You are hereby summoned and required to serve upon T. Scott Jones, plaintiff / plaintiff's attorney, whose address is 2125 Middlebrook Pike, Knoxville, TN 37921 an answer to the complaint herewith served upon you within 30 days after service of this summons and complaint upon you, exclusive of the day of service. A copy of the answer must be filed with the court either before or within a reasonable time after service. If you fail to do so, judgment by default can be taken against you for the relief demanded in the complaint.

Issued and attested this the 12 day of April, 2022

FILED
CHARLES D. SUSANO III
CLERK
2022 APR 12 PM 2:25
KNOX COUNTY CLERK
AND JUVENILE COURT
Charles D. Susano III
Charles D. Susano III, Clerk
Deputy Clerk

NOTICE

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SERVICE INFORMATION

To the process server: Defendant: FEDEX CORPORATION
(TO BE SERVED BY PLAINTIFF'S COUNSEL)

can be served at: FedEx Corporation
c/o C.T. Corporation System, Registered Agent
300 Montvue Rd.
Knoxville, TN 37919-5546

RETURN

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ADA
FOR ASSISTANCE CALL
865 / 215-3641
Elizabeth.Golem@knoxcounty.org

Process Server

Print Name

Address

Phone Number

STATE OF TENNESSEE
THE CIRCUIT COURT FOR KNOX COUNTY

SUMMONS

FILED
CHARLES D. SUSANO III
CLERK
2022 APR 12 PM 3:28

KNOX COUNTY CIRCUIT
CIVIL SESSIONS
AND JUVENILE COURTS
Civil Action No. 2-102-22

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and FEDEX CORPORATION,
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Issued and attested this the 12 day of April, 2022

Charles D. Susano III
Charles D. Susano III, Clerk
[Signature]
Deputy Clerk

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SERVICE INFORMATION

To the process server: Defendant:

USAA CASUALTY INSURANCE COMPANY
(UM/UMICARRIER) (NAIC CoCode: 25968)

can be served at:

USAA Casualty Insurance Company
c/o Commissioner of Insurance
500 James Robertson Parkway
Nashville, TN 37243

 **ADA**
FOR ASSISTANCE CALL
865 / 215-3641
Elizabeth.Golem@knoxcounty.org

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